



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/6/2024

Joshua H. Epstein  
d 212 468 4869  
jepstein@dglaw.com

March 4, 2024

**Via ECF and Email (Torres NYSDChambers@nysd.uscourts.gov)**

The Hon. Analisa Torres  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Neuhauser v. Bolivarian Republic of Venezuela/Case No. 1:20-CV-10342 (AT)**

Dear Judge Torres:

We represent plaintiff Alexander Neuhauser ("Plaintiff") in the above-referenced action. Pursuant to section I(C) of Your Honor's Individual Practices in Civil Cases, we submit this letter-motion to request an extension of time until June 6, 2024 to file a revised motion for default judgment.

On July 3, 2023, this Court filed a certain order (the "Order") denying Plaintiff's motion for default judgment without prejudice to renewal, and providing Plaintiff until August 3, 2023 to file a revised motion (see Dkt. No. 43). Previously, on July 20, 2023, this Court granted Plaintiff's first letter motion for an extension of time until September 8, 2023 (see Dkt. No. 45), on September 6, 2023, this Court granted Plaintiff's second letter motion for an extension of time until October 9, 2023 (see Dkt. No. 47), on October 6, 2023, this Court granted Plaintiff's third letter motion for an extension of time until December 6, 2023 (see Dkt. No. 49), and on December 5, 2023, this Court granted Plaintiff's fourth letter motion for an extension of time until March 6, 2023 (see Dkt. No. 51).

We are requesting this fifth extension of time because Plaintiff's communications with his European bond custodians have been delayed due to circumstances beyond his control. These European parties have been slow to respond to Plaintiff regarding his inquiries, and Plaintiff has encountered difficulty in communicating the urgency of moving this matter forward. We have been diligently following up with Plaintiff, lenders, and custodians to finalize our revised motion for default judgment, and we intend to move forward as soon as possible. As such, we respectfully request this additional time to obtain Plaintiff's revised declaration and needed exhibits for our revised motion.



District Judge Analisa Torres  
March 4, 2024  
Page 2

This is Plaintiff's fifth request for an extension of time to file a revised motion for default judgment, and Defendant Bolivarian Republic of Venezuela has not appeared in this action to date.

We apologize to this Court for Plaintiff's delay in filing the revised motion and greatly appreciate the Court's consideration. Please let me know if there is any additional information that Plaintiff can provide to the Court related to this request.

Respectfully,

*/s/ Joshua H. Epstein*

Joshua H. Epstein

GRANTED.

SO ORDERED.

Dated: March 6, 2024  
New York, New York

  

---

ANALISA TORRES  
United States District Judge